



1801 California Street, 10<sup>th</sup> Floor  
Denver, Colorado 80202  
Phone 303 992-2503  
Facsimile 303 896-1107  
Craig.j.brown@centurylink.com

**Craig J. Brown**  
Senior Associate General Counsel

December 6, 2016

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: *Section 63.71 Application of CenturyLink Communications, LLC, for Authority Pursuant to Section 214 of the Communications Act of 1934, As Amended, To Discontinue the Provision of Service*, WC Docket No. 16-383; Comp. Pol. File No. 1362

On November 2, 2016, CenturyLink filed an application to discontinue the Frame Relay and ATM services provided by its non-ILEC affiliate, CenturyLink Communications, LLC.<sup>1</sup> As discussed in the Application, these services have reached the end of their lifespan, and the manufacturer of the equipment used to provide these services has discontinued its technical support for that equipment. CenturyLink has already discontinued similar services provided by its CenturyTel and Embarq affiliates, and most other providers of Frame Relay and ATM services have done the same. Customers have many alternatives to these services, offered by CenturyLink and other providers.<sup>2</sup> CenturyLink first notified affected customers in 2013 of CenturyLink's intent to discontinue these services, and re-notified the remaining 35 customers in October.

None of the oppositions filed in response to the Petition call into question the merits of CenturyLink's Application. They instead oppose the Application based on the false

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<sup>1</sup> *Section 63.71 Application of CenturyLink Communications, LLC, for Authority Pursuant to Section 214 of the Communications Act of 1934, As Amended, To Discontinue the Provision of Service*, Section 63.71 Application, WC Docket No. 16-383 (filed Nov. 2, 2016) (Application). See also *Comments Invited on Section 214 Application(s) to Discontinue Domestic Non-Dominant Carrier Telecommunications Services*, Public Notice, WC Docket No. 16-383, DA 16-1280 (rel. Nov. 15, 2016).

<sup>2</sup> Application at 3.

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premise that the proposed discontinuance will somehow affect CenturyLink's provision of traditional telephone service or other landline-based consumer services. It will not. The Frame Relay and ATM services proposed to be discontinued are data services provided to enterprise customers.

Notably, no subscriber to these Frame Relay and ATM services opposes CenturyLink's Application. The Commission therefore need not consider these misdirected oppositions and should allow the Application to be granted automatically through its normal processes.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this ex parte presentation is being filed in the appropriate docket.

Sincerely,

/s/ Craig J. Brown

cc: Kimberly Jackson, FCC  
Rodney McDonald, FCC